

J. Noah Hagey, Esq. (SBN: 262331)  
[hagey@braunhagey.com](mailto:hagey@braunhagey.com)  
 Matthew Borden, Esq. (SBN: 214323)  
[borden@braunhagey.com](mailto:borden@braunhagey.com)  
 Ellen V. Leonida, Esq. (SBN: 184194)  
[leonida@braunhagey.com](mailto:leonida@braunhagey.com)  
 Andrew Levine, Esq. (SBN: 278246)  
[levine@braunhagey.com](mailto:levine@braunhagey.com)  
 Yekaterina Kushnir, Esq. (SBN: 350843)  
[kushnir@braunhagey.com](mailto:kushnir@braunhagey.com)  
 BRAUNHAGEY & BORDEN LLP  
 351 California Street, 10th Floor  
 San Francisco, CA 94104  
 Telephone: (415) 599-0210  
 Facsimile: (415) 276-1808

Garrett Biedermann, Esq. (*pro hac vice*)  
[biedermann@braunhagey.com](mailto:biedermann@braunhagey.com)  
 Eric Schlabs, Esq. (*pro hac vice*)  
[schlabs@braunhagey.com](mailto:schlabs@braunhagey.com)  
 BRAUNHAGEY & BORDEN LLP  
 118 W 22nd Street, 12th Floor  
 New York, NY 10011  
 Telephone: (646) 829-9403  
 Facsimile: (646) 403-4089

ATTORNEYS FOR DIRECT PURCHASER PLAINTIFFS

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

IN RE TELESCOPES ANTITRUST  
 LITIGATION

Case No. 5:20-cv-03639-EJD

This Document Relates to:

Case No. 5:20-cv-03642-EJD

AURORA ASTRO PRODUCTS LLC,  
 PIONEER CYCLING & FITNESS, LLP, and  
 those similarly situated,

Plaintiffs,

v.

CELESTRON ACQUISITION, LLC, SUZHOU  
 SYNTA OPTICAL TECHNOLOGY CO., LTD.,  
 SYNTA CANADA INT'L ENTERPRISES  
 LTD., SW TECHNOLOGY CORP., OLIVON  
 MANUFACTURING CO. LTD., OLIVON USA,  
 LLC, NANTONG SCHMIDT OPTO-  
 ELECTRICAL TECHNOLOGY CO. LTD.,

**DECLARATION OF YEKATERINA  
 KUSHNIR IN SUPPORT OF DIRECT  
 PURCHASER PLAINTIFFS'  
 ADMINISTRATIVE MOTION TO  
 CONSIDER WHETHER ANOTHER  
 PARTY'S MATERIAL SHOULD BE  
 SEALED**

**Compl. Filed:** June 1, 2020  
**Fourth Am.** September 1, 2023  
**Compl. Filed:**  
**Trial Date:** None Set

1 NINGBO SUNNY ELECTRONIC CO., LTD.,  
2 PACIFIC TELESCOPE CORP., COREY LEE,  
3 DAVID SHEN, SYLVIA SHEN, JACK CHEN,  
4 JEAN SHEN, JOSEPH LUPICA, DAVE  
5 ANDERSON, LAURENCE HUEN, and DOES  
6 1-50,

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

Defendants.

1 I, Yekaterina Kushnir, declare:

2 1. I am licensed to practice before this Court and am counsel of record for Direct  
3 Purchaser Plaintiffs (“DPPs”). I make this declaration based on personal knowledge. If called as a  
4 witness, I could and would testify competently to the facts stated herein.

5 2. I make this declaration in support of DPPs’ Administrative Motion to Consider  
6 Whether Another Party’s Material Should Be Sealed, filed concurrently with DPPs’ Motion for  
7 Class Certification on May 20, 2024 (the “Motion”).

8 3. Portions of the Motion, and materials filed in support of the Motion, describe,  
9 characterize, quote, or otherwise illustrate documents or portions of documents designated by  
10 Defendants as “Highly Confidential – Attorneys’ Eyes Only” in this matter under the Stipulated  
11 Protective Order. (ECF No. 137.)

12 4. Attached as **Exhibit 1** is a true and correct copy of the Motion. DPPs file the  
13 highlighted portions of the Motion conditionally under seal, as set forth in the accompanying  
14 administrative motion to seal.

15 5. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of J. Douglas  
16 Zona. DPPs file the highlighted portions of this document conditionally under seal, as set forth in  
17 the accompanying administrative motion to seal.

18 6. Attached as **Exhibit 3** is a true and correct copy of a document produced by  
19 Defendants in this action bearing the bates number DEFS001666934, and followed by a certified  
20 translation of the same document into English. This document is also attached as Exhibit 1 to the  
21 Declaration of Matthew Borden in Support of DPPs’ Motion. DPPs file this document  
22 conditionally under seal, as set forth in the accompanying administrative motion to seal.

23 7. Attached as **Exhibit 4** is a true and correct copy of a document produced by  
24 Defendants in this action bearing the bates number DEFS001767435. This document is also  
25 attached as Exhibit 2 to the Declaration of Matthew Borden in Support of DPPs’ Motion. DPPs file  
26 this document conditionally under seal, as set forth in the accompanying administrative motion to  
27 seal.  
28

1           8.       Attached as **Exhibit 5** is a true and correct copy of a document produced by  
2 Defendants in this action bearing the bates number DEFS000602711. This document is also  
3 attached as Exhibit 3 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file  
4 this document conditionally under seal, as set forth in the accompanying administrative motion to  
5 seal.

6           9.       Attached as **Exhibit 6** is a true and correct copy of a document produced by  
7 Defendants in this action bearing the bates number DEFS005570684, and followed by a certified  
8 translation of the same document into English. This document is also attached as Exhibit 4 to the  
9 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
10 conditionally under seal, as set forth in the accompanying administrative motion to seal.

11          10.      Attached as **Exhibit 7** is a true and correct copy of a document produced by  
12 Defendants in this action bearing the bates number DEFS005570685. This document is also  
13 attached as Exhibit 5 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file  
14 this document conditionally under seal, as set forth in the accompanying administrative motion to  
15 seal.

16          11.      Attached as **Exhibit 8** is a true and correct copy of a document produced by  
17 Defendants in this action bearing the bates number DEFS021727419, and followed by a certified  
18 translation of the same document into English. This document is also attached as Exhibit 6 to the  
19 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
20 conditionally under seal, as set forth in the accompanying administrative motion to seal.

21          12.      Attached as **Exhibit 9** is a true and correct copy of a document produced by  
22 Defendants in this action bearing the bates number DEFS001224632. This document is also  
23 attached as Exhibit 7 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file  
24 this document conditionally under seal, as set forth in the accompanying administrative motion to  
25 seal.

26          13.      Attached as **Exhibit 10** are true and correct excerpts from the transcript for the  
27 September 10, 2023 deposition of Dagong Shen in this case. This document is also attached as  
28

1 Exhibit 8 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this  
2 document conditionally under seal, as set forth in the accompanying administrative motion to seal.

3 14. Attached as **Exhibit 11** are true and correct excerpts from the transcript for the  
4 March 28, 2024 Rule 30(b)(6) deposition of Corey Lee for Defendant Celestron Acquisition, LLC.  
5 This document is also attached as Exhibit 9 to the Declaration of Matthew Borden in Support of  
6 DPPs' Motion. DPPs file this document conditionally under seal, as set forth in the accompanying  
7 administrative motion to seal.

8 15. Attached as **Exhibit 12** are true and correct excerpts from the transcript for the April  
9 16, 2024 deposition of Defendant Joseph Lupica. This document is also attached as Exhibit 10 to  
10 the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
11 conditionally under seal, as set forth in the accompanying administrative motion to seal.

12 16. Attached as **Exhibit 13** are true and correct excerpts from the transcript for the  
13 February 19, 2024 deposition of Defendant David Anderson. This document is also attached as  
14 Exhibit 11 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this  
15 document conditionally under seal, as set forth in the accompanying administrative motion to seal.

16 17. Attached as **Exhibit 14** is a true and correct copy of a document produced by  
17 Defendants in this action bearing the bates number DEFS002593681. This document is also  
18 attached as Exhibit 12 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
19 file this document conditionally under seal, as set forth in the accompanying administrative motion  
20 to seal.

21 18. Attached as **Exhibit 15** is a true and correct copy of a document produced by  
22 Defendants in this action bearing the bates number DEFS005642649, and followed by a certified  
23 translation of the same document into English. This document is also attached as Exhibit 13 to the  
24 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
25 conditionally under seal, as set forth in the accompanying administrative motion to seal.

26 19. Attached as **Exhibit 16** is a true and correct copy of a document produced by  
27 Defendants in this action bearing the bates number DEFS000672000. This document is also  
28 attached as Exhibit 14 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs

1 file this document conditionally under seal, as set forth in the accompanying administrative motion  
2 to seal.

3 20. Attached as **Exhibit 17** is a true and correct copy of a document produced by  
4 Defendants in this action bearing the bates number DEFS002593042. This document is also  
5 attached as Exhibit 15 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
6 file this document conditionally under seal, as set forth in the accompanying administrative motion  
7 to seal.

8 21. Attached as **Exhibit 18** is a true and correct copy of a document produced by  
9 Defendants in this action bearing the bates number DEFS000685498. This document is also  
10 attached as Exhibit 16 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
11 file this document conditionally under seal, as set forth in the accompanying administrative motion  
12 to seal.

13 22. Attached as **Exhibit 19** is a true and correct copy of a document produced by  
14 Defendants in this action bearing the bates number DEFS002899466. This document is also  
15 attached as Exhibit 17 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
16 file this document conditionally under seal, as set forth in the accompanying administrative motion  
17 to seal.

18 23. Attached as **Exhibit 20** is a true and correct copy of a document produced by  
19 Defendants in this action bearing the bates number DEFS002621723. This document is also  
20 attached as Exhibit 18 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
21 file this document conditionally under seal, as set forth in the accompanying administrative motion  
22 to seal.

23 24. Attached as **Exhibit 21** are true and correct excerpts from the transcript for the  
24 September 14, 2023 deposition of Yongxue Dong. This document is also attached as Exhibit 19 to  
25 the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
26 conditionally under seal, as set forth in the accompanying administrative motion to seal.

27 25. Attached as **Exhibit 22** are true and correct excerpts from the transcript for the  
28 March 27, 2024 Rule 30(b)(6) deposition of Sylvia Shen on behalf of Defendant SW Technology

1 Corp. This document is also attached as Exhibit 20 to the Declaration of Matthew Borden in  
2 Support of DPPs' Motion. DPPs file this document conditionally under seal, as set forth in the  
3 accompanying administrative motion to seal.

4 26. Attached as **Exhibit 23** is a true and correct copy of a document produced by  
5 Defendants in this action bearing the bates number DEFS000777210. This document is also  
6 attached as Exhibit 21 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
7 file this document conditionally under seal, as set forth in the accompanying administrative motion  
8 to seal.

9 27. Attached as **Exhibit 24** is a true and correct copy of a document produced by  
10 Defendants in this action bearing the bates number DEFS000778041. This document is also  
11 attached as Exhibit 22 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
12 file this document conditionally under seal, as set forth in the accompanying administrative motion  
13 to seal.

14 28. Attached as **Exhibit 25** is a true and correct copy of an email produced by  
15 Defendant Ningbo Sunny Electronic Co., Ltd. in the case *Optronics Techs., Inc. v. Ningbo Sunny*  
16 *Electronic Co., Ltd.*, Case No. 5:16-cv-06370-EJD (the "Orion Litigation"), and re-produced by  
17 Optronic Technologies, Inc. in this case, bearing the trial exhibit number 1311, and beginning bates  
18 number NSE2236655. This document is also attached as Exhibit 23 to the Declaration of Matthew  
19 Borden in Support of DPPs' Motion. DPPs file this document conditionally under seal, as set forth  
20 in the accompanying administrative motion to seal.

21 29. Attached as **Exhibit 26** are true and correct excerpts from the transcript for the  
22 March 7, 2024 deposition of Michael Sun. This document is also attached as Exhibit 24 to the  
23 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
24 conditionally under seal, as set forth in the accompanying administrative motion to seal.

25 30. Attached as **Exhibit 27** is a true and correct copy of a document produced by  
26 Defendants in this action bearing the bates number DEFS001774701. This document is also  
27 attached as Exhibit 25 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
28

1 file this document conditionally under seal, as set forth in the accompanying administrative motion  
2 to seal.

3 31. Attached as **Exhibit 28** is a true and correct copy of a document produced by  
4 Defendants in this action bearing the bates number DEFS002416861. This document is also  
5 attached as Exhibit 26 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
6 file this document conditionally under seal, as set forth in the accompanying administrative motion  
7 to seal.

8 32. Attached as **Exhibit 29** are true and correct excerpts from the transcript for the  
9 September 24, 2023 deposition of David Shen. This document is also attached as Exhibit 27 to the  
10 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
11 conditionally under seal, as set forth in the accompanying administrative motion to seal.

12 33. Attached as **Exhibit 30** is a true and correct copy of a document produced by  
13 Defendants in this action bearing the bates number DEFS005846579. This document is also  
14 attached as Exhibit 28 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
15 file this document conditionally under seal, as set forth in the accompanying administrative motion  
16 to seal..

17 34. Attached as **Exhibit 31** is a true and correct copy of a document produced by  
18 Defendants in this action bearing the bates number DEFS000689264. This document is also  
19 attached as Exhibit 29 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
20 file this document conditionally under seal, as set forth in the accompanying administrative motion  
21 to seal.

22 35. Attached as **Exhibit 32** is a true and correct copy of a document produced by  
23 Defendants in this action bearing the bates number DEFS000759376. This document is also  
24 attached as Exhibit 30 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
25 file this document conditionally under seal, as set forth in the accompanying administrative motion  
26 to seal.

27 36. Attached as **Exhibit 33** is a true and correct copy of a document produced by  
28 Defendants in this action bearing the bates number DEFS002643151. This document is also



1 attached as Exhibit 31 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
2 file this document conditionally under seal, as set forth in the accompanying administrative motion  
3 to seal.

4 37. Attached as **Exhibit 34** is a true and correct copy of a document produced by  
5 Defendants in this action bearing the bates number DEFS002637252, and followed by a certified  
6 translation of the same document into English. This document is also attached as Exhibit 33 to the  
7 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
8 conditionally under seal, as set forth in the accompanying administrative motion to seal.

9 38. Attached as **Exhibit 35** is a true and correct copy of a document produced by  
10 Defendants in this action bearing the bates number DEFS002622384. This document is also  
11 attached as Exhibit 34 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
12 file this document conditionally under seal, as set forth in the accompanying administrative motion  
13 to seal.

14 39. Attached as **Exhibit 36** is a true and correct copy of a document produced by  
15 Defendants in this action bearing the bates number DEFS021595704. This document is also  
16 attached as Exhibit 35 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
17 file this document conditionally under seal, as set forth in the accompanying administrative motion  
18 to seal.

19 40. Attached as **Exhibit 37** is a true and correct copy of a document produced by  
20 Defendants in this action bearing the bates number DEFS000586679. This document is also  
21 attached as Exhibit 36 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
22 file this document conditionally under seal, as set forth in the accompanying administrative motion  
23 to seal.

24 41. Attached as **Exhibit 38** is a true and correct copy of a document produced by  
25 Defendants in this action bearing the bates number DEFS005605254, and followed by a certified  
26 translation of the same document into English. This document is also attached as Exhibit 37 to the  
27 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
28 conditionally under seal, as set forth in the accompanying administrative motion to seal.

1           42. Attached as **Exhibit 39** is a true and correct copy of a document produced by  
2 Defendants in this action bearing the bates number DEFS002619538. This document is also  
3 attached as Exhibit 38 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
4 file this document conditionally under seal, as set forth in the accompanying administrative motion  
5 to seal.

6           43. Attached as **Exhibit 40** is a true and correct copy of a document produced by  
7 Defendants in this action bearing the bates number DEFS002619583. This document is also  
8 attached as Exhibit 39 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
9 file this document conditionally under seal, as set forth in the accompanying administrative motion  
10 to seal.

11           44. Attached as **Exhibit 41** is a true and correct copy of a document produced by  
12 Defendants in this action bearing the bates number DEFS000602743. This document is also  
13 attached as Exhibit 40 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
14 file this document conditionally under seal, as set forth in the accompanying administrative motion  
15 to seal.

16           45. Attached as **Exhibit 42** is a true and correct copy of a document produced by  
17 Defendants in this action bearing the bates number DEFS000611300. This document is also  
18 attached as Exhibit 41 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
19 file this document conditionally under seal, as set forth in the accompanying administrative motion  
20 to seal.

21           46. Attached as **Exhibit 43** is a true and correct copy of a document produced by  
22 Defendants in this action bearing the bates number DEFS000756896. This document is also  
23 attached as Exhibit 42 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
24 file this document conditionally under seal, as set forth in the accompanying administrative motion  
25 to seal.

26           47. Attached as **Exhibit 44** is a true and correct copy of a document produced by  
27 Defendants in this action bearing the bates number DEFS000680813. This document is also  
28 attached as Exhibit 43 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs

1 file this document conditionally under seal, as set forth in the accompanying administrative motion  
2 to seal.

3 48. Attached as **Exhibit 45** is a true and correct copy of a document produced by  
4 Defendants in this action bearing the bates number DEFS000661323. This document is also  
5 attached as Exhibit 44 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
6 file this document conditionally under seal, as set forth in the accompanying administrative motion  
7 to seal.

8 49. Attached as **Exhibit 46** is a true and correct copy of a document produced by  
9 Defendants in this action bearing the bates number DEFS002644514. This document is also  
10 attached as Exhibit 45 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
11 file this document conditionally under seal, as set forth in the accompanying administrative motion  
12 to seal.

13 50. Attached as **Exhibit 47** is a true and correct copy of a document produced by  
14 Defendants in this action bearing the bates number DEFS002915762. This document is also  
15 attached as Exhibit 47 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
16 file this document conditionally under seal, as set forth in the accompanying administrative motion  
17 to seal.

18 51. Attached as **Exhibit 48** is a true and correct copy of a document produced by  
19 Defendants in this action bearing the bates number DEFS002574899. This document is also  
20 attached as Exhibit 48 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
21 file this document conditionally under seal, as set forth in the accompanying administrative motion  
22 to seal.

23 52. Attached as **Exhibit 49** is a true and correct copy of a document produced by  
24 Defendants in this action bearing the bates number DEFS002416861, and followed by a certified  
25 translation of the same document into English. This document is also attached as Exhibit 49 to the  
26 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
27 conditionally under seal, as set forth in the accompanying administrative motion to seal.  
28

1           53. Attached as **Exhibit 50** is a true and correct copy of a document produced by  
2 Defendants in this action bearing the bates number DEFS000000025. This document is also  
3 attached as Exhibit 50 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
4 file this document conditionally under seal, as set forth in the accompanying administrative motion  
5 to seal.

6           54. Attached as **Exhibit 51** is a true and correct copy of a document produced by  
7 Defendants in this action bearing the bates number DEFS005672175, and followed by a certified  
8 translation of the same document into English. This document is also attached as Exhibit 51 to the  
9 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
10 conditionally under seal, as set forth in the accompanying administrative motion to seal.

11           55. Attached as **Exhibit 52** is a true and correct copy of a document produced by  
12 Defendants in this action bearing the bates number DEFS005776816RP, and followed by a  
13 certified translation of the same document into English. This document is also attached as Exhibit  
14 52 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
15 conditionally under seal, as set forth in the accompanying administrative motion to seal.

16           56. Attached as **Exhibit 53** is a true and correct copy of a document produced by  
17 Defendants in this action bearing the bates number DEFS005776817RP, and followed by a  
18 certified translation of the same document into English. This document is also attached as Exhibit  
19 53 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
20 conditionally under seal, as set forth in the accompanying administrative motion to seal.

21           57. Attached as **Exhibit 54** is a true and correct copy of a document produced by  
22 Defendants in this action bearing the bates number DEFS005720262, and followed by a certified  
23 translation of the same document into English. This document is also attached as Exhibit 54 to the  
24 Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
25 conditionally under seal, as set forth in the accompanying administrative motion to seal.

26           58. Attached as **Exhibit 55** is a true and correct copy of a document produced by  
27 Defendants in this action bearing the bates number DEFS000756356. This document is also  
28 attached as Exhibit 55 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs

1 file this document conditionally under seal, as set forth in the accompanying administrative motion  
2 to seal.

3 59. Attached as **Exhibit 56** is a true and correct copy of a document produced by  
4 Defendants in this action bearing the bates number DEFS000774569. This document is also  
5 attached as Exhibit 90 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs  
6 file this document conditionally under seal, as set forth in the accompanying administrative motion  
7 to seal.

8 60. Attached as **Exhibit 57** are true and correct excerpts from the transcript for the  
9 August 14, 2023 deposition of Defendant Corey Lee. This document is also attached as Exhibit 92  
10 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
11 conditionally under seal, as set forth in the accompanying administrative motion to seal.

12 61. Attached as **Exhibit 58** are true and correct excerpts from the transcript for the  
13 August 15, 2023 deposition of Defendant Corey Lee. This document is also attached as Exhibit 93  
14 to the Declaration of Matthew Borden in Support of DPPs' Motion. DPPs file this document  
15 conditionally under seal, as set forth in the accompanying administrative motion to seal.

16 62. Attached as **Exhibit 59** is a true and correct copy of an email produced by  
17 Defendants in this case, bearing the beginning bates number DEFS001982299. This document is  
18 also attached as Exhibit 94 to the Declaration of Matthew Borden in Support of DPPs' Motion.  
19 DPPs file this document conditionally under seal, as set forth in the accompanying administrative  
20 motion to seal.

21  
22 I swear under penalty of perjury under the laws of the United States that the foregoing is  
23 true and correct.

24  
25 Dated: May 20, 2024

By: /s/ Yekaterina Kushnir  
Yekaterina Kushnir